

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE, WSBN 32245
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration
ERIN A. JURRENS, MO 61402
Special Assistant United States Attorney
Office of the General Counsel
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (877) 833-2445
E-Mail: Erin.Jurrens@ssa.gov
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MARK ALLEN HOWELL,)	Case No. 2:23-cv-00120-JDP
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from July 20, 2023 up to and including August 21, 2023. This is the Defendant's first request for an extension.

Defendant requests this extension in order to further consider the 1,170 page administrative record in light of the issues raised in Plaintiff's motion. The undersigned has a number of competing deadlines in disability cases pending in this district, as well as in the Second Circuit Court of Appeals, the District of Oregon, the District of Connecticut, and the Eastern District of New York.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3 Respectfully submitted,

4 Dated: July 19, 2023

/s/ Monica Perales*

(*as authorized via e-mail on July 14, 2023)

MONICA PERALES

Attorney for Plaintiff

7 Dated: July 19, 2023

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

11 By: /s/ Erin A. Jurrens

ERIN A. JURRENS

Special Assistant U.S. Attorney

Attorneys for Defendant

15 **ORDER**

16 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
17 extension, up to and including August 21, 2023, to respond to Plaintiff's Motion for Summary
18 Judgment.

19
20 IT IS SO ORDERED.

21
22 Dated: July 19, 2023


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE